

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
JAN 26 2024
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Terrence Chaney

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Cook County

Case No: 22:cv:3501
(To be supplied by the Clerk of this Court)

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒ AMENDED COMPLAINT

☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐ OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

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I. Plaintiff(s):

- A. Name: Terrence Chaney
- B. List all aliases: _____
- C. Prisoner identification number: 20200830015
- D. Place of present confinement: Cook County Jail
- E. Address: 2700 S. Sacramento Ave., Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Cook County
Title: Cook County Department of Corrections
Place of Employment: Jail
- B. Defendant: _____
Title: _____
Place of Employment: _____
- C. Defendant: _____
Title: _____
Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

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III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Charney V. Cook County
23:cv:264P
- B. Approximate date of filing lawsuit: 04/16/23
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: Cook County

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. District Court, Northern District of Illinois
- F. Name of judge to whom case was assigned: Hon. Steven C. Seeger
- G. Basic claim made: Deliberate indifference, negligence in
providing post-surgical care.
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): PENDING
- I. Approximate date of disposition: 12/05/23

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

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IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On March 29, 2022, I was attacked on my living unit by another inmate (Dasunnu) with a wooden cane. I suffered a loss of consciousness, a wound to the eye, and my right leg was broken in two places, requiring surgery. While the use of canes may be authorized for traveling long distances off the tier, the use of canes or crutches on the tier is, and was prohibited, with the exception being the medical unit (Division 8-RTU). By failing to adhere to its own policy, and essentially arming dangerous, violent people with weapons, the Cook County Department of Corrections acted with a callous disregard for prisoner safety.

My ability to participate in routine daily activities such as recreation, work, and worship have been deeply impacted. In my career, as a roofer, I am expected to spend approximately 6 hours a day on my knees, working. In my religion, Islam, I need to be able to prostrate in order to pray properly. In my recreation, I like to exercise and play basketball. These vital areas of my life are now hindered due to the

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limitations I have incurred resulting from this incident.
The incident took place at approximately 12:00 PM, in
Division 10, tier 1A. Officer Thigpen is the officer that was
assigned to my tier that day. His (Off. Thigpen's) report
confirms an assault with a wooden cane.

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V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want the court to ensure that no individual in custody will again have to suffer as the result of a callous disregard for prisoner safety. I also want to recover punitive damages for physical injury, pain and suffering.

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 13th day of January, 2024

Terrence Chaney
(Signature of plaintiff or plaintiffs)

Terrence Chaney
(Print name)

20200830015
(I.D. Number)

2100 S. Sacramento Ave.
Chicago, IL 60608
(Address)

Terrence Chaney
20200830015
2700 S. Sacramento Ave.
Chicago, IL 60608



01/26/2024-21



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Prisoner Correspondence
U.S. District Court
219 S. Dearborn St., 20th FL
Chicago, IL 60604